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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

No. CR 11-0488 RS

v.

**UNITED STATES' NOTICE OF  
SPECIFIC OBJECTIONS TO  
DEFENSE PROPOSED  
TRANSLATIONS**

EAGLE EYES TRAFFIC INDUSTRIAL  
CO., LTD.; E-LITE AUTOMOTIVE, INC.;  
HOMY HONG-MING HSU; and YU-CHU  
LIN, aka David Lin,

Trial Date: October 29, 2012

Defendants.

Hon. Richard Seeborg  
United States District Judge

Defendants have proposed 45 translations to date. The parties have discussed and agreed to these proposed translations except for the following issues:

Chinese	Defense Proposed Translation	Government Proposed Translation	Document(s)
更何況 (gēng hé kuàng)	<b>Not to say</b> , all Long Feng's direct and indirect prices are all going according to the three parties' agreement	<b>Besides</b> , all Long Feng's direct and indirect prices are all going according to the three parties' agreement	SLDOJ-005_E (D026T)

Chinese	Defense Proposed Translation	Government Proposed Translation	Document(s)
指導 (zhǐdǎo)	advise; advice	guide; guidance	EE_DOJ_00007563_E (D028T)
共識 (gòngshí)	understanding	consensus	TYCC000000026_E (D020T) TYCC000000092_E (D021T) DAP0000205_E (D035T)
合作 (hézuò)	worked together	cooperation	TYCC000000026_E (D020T)
協定 (xiédìng)	discussion	agreement	TYCC000000092_E (D021T) TYCC00000333_E (D025T)
協定 (xiédìng)	negotiation	agreement	TYCC000000092_E (D021T) EE-0000006_E (D024T) TYCC00000333_E (D025T)
基本的 價格協 議 (jīběn de jiàgé xiéyì)	general price understanding	basic price agreement	TYCC000000026_E (D020T)
協議 (xiéyì)	discussion	agreement	TYCC000000092_E (D021T) TYCC000000033_E (D004T) DAP0002377_E (D041T)
協議的 價格結 構 (xiéyì de Jiàgé Jiégòu)	make-up of the prices negotiated	agreed price structure	TYCC000000026_E (D020T)

Chinese	Defense Proposed Translation	Government Proposed Translation	Document(s)
約定 (yuēdìng)	arranged	agreed	TYCC00000026_E (D020T)
統一 (tǒng yī)	integrating	unifying	DAP0000244_E (D036T)
verb tense	TYC, Depo, Eagle Eyes <b>to sign</b> negotiation conclusion  TYC and Depo price difference <b>will be</b> 5%-8%  The basic price difference between have-warehouse in US and not-have-warehouse in US <b>will be</b> 15%...  TYC and Eagle Eyes price difference <b>will be</b> 20%-25%	TYC, Depo, Eagle Eyes <b>sign</b> negotiation conclusion  TYC and Depo price difference 5%-8%  The basic price difference between have-warehouse in US and not-have-warehouse in US 15%...  TYC and Eagle Eyes price difference 20%-25%	DAP0002213_E (D013T)
總經理 (zǒng jīnglǐ)	Chairman [Shiu-Min Hsu]	President	DAP0002134_E (D022T) DAP0002143_E (D037T)
許總經理 (xǔ zǒng jīnglǐ)	Chairman [Shiu-Min] Hsu	President Hsu	DAP0002139_E (D023T) EE-0000006_E (D024T) TYCC00000333_E (D025T) DAP0002143_T (D037T) DAP0000290_E (D045T)
總經理 (zǒng jīnglǐ)	President [Hsia]	President	TYCC00000092_E (D021T)
總經理 (zǒng jīnglǐ)	President [Ho]	President	EE-0000006_E (D024T) TYCC00000333_E (D025T)

1 In addition, the parties are working through various typos, missing text, or other minor  
2 discrepancies in the following defense translations:

- 3 1. EE\_DOJ\_00004171\_E (D005T)
- 4 2. DAP0057194\_E (D016T)
- 5 3. DAP0002211\_E (D030T)
- 6 4. DAP0000205\_E (D035T)
- 7 5. DAP0000282\_E (D038T)
- 8 6. EE\_DOJ\_00004088\_E (D039T)
- 9 7. TYCC00072309\_E (D042T)
- 10 8. DAP0000247\_E (D043T)
- 11 9. DAP0000290\_E (D045T)

12 Finally, defense counsel has informed the government that they have additional  
13 translations to propose. The parties intend to continue meeting and conferring at least weekly  
14 regarding translations. To the extent the government objects to additional translations the  
15 defense proposes, the government will notify the Court with supplemental filings.

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17 DATED: September 12, 2012.

Respectfully submitted,

18  
19 /s/ Kelsey C. Linnett  
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